

Executive Registry

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MEMORANDUM FOR: Executive Secretary, NFIB

FROM : E. H. Knoche
CIA Member, NFIB

SUBJECT : CIA Comments on Attachment to NFIB-9.1/30

REFERENCE : NFIB-9.1/30, 16 June 1977,
Subject: Paragraph Security Markings

Attached are CIA comments on the referenced draft
NFIB memorandum.

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E. H. Knoche

Attachment:
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CIA Comments on Draft NFIB Memorandum
on Paragraph Security Markings

CIA's basic concerns with the subject NFIB draft are:

- the absence of provisions for granting exemptions from the requirement for paragraph security markings,
- the need for shorter abbreviations of control markings, and
- the placement of classification symbols at the beginnings of paragraphs.

We also believe that there should be a specific statement exempting [redacted] information reports and operational correspondence from paragraph markings.

Exemption Authority

We agree that full paragraph markings are both necessary and feasible for most Intelligence Community documents. There will be instances where markings are not practicable for technical or presentational reasons, and this was recognized in both E.O. 11652 and the NSCD implementing E.O. 11652, which provide that paragraphs should be marked "to the extent practicable." NFIB guidance should acknowledge that there will be exceptions, and NFIB Principals should be granted the flexibility to authorize them.

Abbreviations

Control marking abbreviations should be limited to two letters. Those prescribed [redacted]

[redacted] than one control is required or when controls are used in combination with [redacted]

Classification Symbols

Classification symbols should appear at the end of the paragraphs along with control markings. The proposed

separation of classification and control markings is distracting and confusing to the reader, and unnecessary for the purpose of complying with E.O. 11652. If others object to this proposal, NFIB guidance should permit the option of placing classification symbols at either the beginning or end of paragraphs.

Other Comments


Comments on other areas of concern to CIA are summarized below:

Draft Memorandum to NFIB Principals

- The subject of the draft memorandum and guidance paper should read, to be more precise, "Security Markings of Paragraphs, Subjects, and Titles."
- In addition to the discussion of the
acknowledgement of the need to protect against the unauthorized disclosure of information that has been classified under the provisions of E.O. 11652 (Section 1), "in the interest of the national defense or foreign relations of the United States..."
- Paragraph 2 of the draft memorandum should make reference to paragraph 8 regarding the handling of control markings authorized by earlier directives.
- The reference in the first sentence of paragraph 3 to "other finished documents" would appear to be unnecessary.

Guidance for Paragraph and Title Markings

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- Paragraph 5 provides only for classification symbols to be used in parentheses after a subject or title. The guidance paper should recognize that, on occasion, control markings also may be required.